

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

| | | |
|---|---|-------------------------------|
| ALBERT SMELKO, JR., Individually and on Behalf of All Others Similarly Situated, |) | Civ. No.0:15-cv-00455-PJS-FLN |
| |) | |
| Plaintiff, |) | <u>CLASS ACTION</u> |
| |) | |
| vs. |) | |
| |) | |
| STRATASYS LTD., DAVID REIS and EREZ SIMHA, |) | |
| |) | |
| Defendants. |) | |
| |) | |

**STIPULATION EXTENDING
TIME TO RESPOND TO COMPLAINT**

WHEREAS, the above-described action is an alleged class action that is subject to the Private Securities Litigation Reform Act of 1995 (“PSLRA”), 15 U.S.C. §§ 78u-4, *et seq.*;

WHEREAS, additional related cases may be filed, assigned, or transferred to this Court;

WHEREAS, the PSLRA contemplates that the plaintiff who filed the initial action must publish notice to the purported class within 20 days of filing the action informing the class members of their right to seek appointment as lead plaintiff within 60 days of publication of the notice. *See* 15 U.S.C. § 78u-4(a)(3);

WHEREAS, the parties anticipate that one or more motions for appointment as lead plaintiff will be filed and that the Court will consolidate any related actions and appoint a lead plaintiff and lead counsel pursuant to the PSLRA; and

WHEREAS, the parties, through their respective undersigned counsel, agree that until the Court appoints a lead plaintiff and lead counsel in this action pursuant to 15 U.S.C. § 78u-

4(a)(3)(B), and until such lead plaintiff and lead counsel determine their pleading for future purposes, defendants should not be required to respond to the complaint filed currently filed in this action (Dkt. No. 1 (the “Complaint”));

NOW, THEREFORE, the parties to this action, by their respective undersigned counsel, **STIPULATE** and **AGREE** that:

1. Defendants shall have no obligation to answer or otherwise respond to the Complaint or to other related complaints filed in or assigned or transferred to this Court; and

2. Within 20 days after the entry of an order appointing, pursuant to the PSLRA, lead plaintiff and lead counsel in the above-captioned action (or a consolidated action encompassing the above-captioned action), the parties shall confer and propose to the Court dates by which: (1) lead plaintiff shall either (a) serve and file an amended or consolidated class action complaint which shall serve as the operative complaint in the action and shall supersede any other complaints filed in or assigned or transferred to this Court, or (b) notify defendants’ counsel that the Complaint will be the operative complaint; and (2) each of the defendants (or group of defendants represented by the same counsel) shall answer or otherwise respond to the operative complaint.

There have been no requests for an extension of time previously made in this matter.

Dated: March 25, 2015

By: /s/ Jack Reise

ZIMMERMAN REED, PLLP

Carolyn G. Anderson, MN 275712
Brian C. Gudmundson, MN 336695
1100 IDS Center, 80 South 8th Street
Minneapolis, MN 55402
Tel: (612) 341-0400
Fax: (612) 341 -0844
Carolyn.Anderson@zimmerreed.com
Brian.Gudmundson@zimmerreed.com

**ROBBINS GELLER RUDMAN &
DOWD LLP**

Jack Reise
Robert J. Robbins
120 East Palmetto Park Road, Suite 500
Boca Raton, FL 33432
Tel: (561) 750-3000
Fax: (561) 750-3364
JReise@rgrdlaw.com
RRobins@rgrdlaw.com

HOLZER & HOLZER, LLC

Corey D. Holzer
1200 Ashwood Parkway, Suite 410
Atlanta, GA 30338
Tel: (770) 392-0090
Fax: (770) 392-0029
cholzer@holzerlaw.com

Attorneys for Plaintiff Albert Smelko, Jr.

Dated: March 25, 2015

FAEGRE BAKER DANIELS LLP

By: /s/ Wendy J. Wildung

Wendy J. Wildung, MN 117055
2200 Wells Fargo Center
90 South Seventh Street
Minneapolis, MN 55402-3901
Tel: (612) 766-7000
Fax: (612) 766 -1600
Wendy.wildung@faegreBD.com

COOLEY LLP

Koji F. Fukumura
4401 Eastgate Mall
San Diego, CA 92121
Tel: (858) 550-6000
Fax: (858) 550-6240
kfukumura@cooley.com

John C. Dwyer
3175 Hanover Street
Palo Alto, CA 94304
Tel: (650) 843-5000
Fax: (650) 843-5228

*Attorneys for Defendants Stratasys, Ltd.,
David Reis, and Erez Simha*